

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

In re: Todd Christopher Campbell)	
xxx-xx-1843)	Case No. 20-80391-CRJ-13
)	
Tabitha Rena Vinson Campbell)	
xxx-xx-4033)	
Debtors)	

MOTION FOR APPROVAL OF SETTLEMENT

COME NOW Todd Christopher Campbell and Tabitha Rena Vinson Campbell, the above captioned Debtors, by and through their undersigned attorney, Amy K. Tanner, and respectfully represent:

1. On December 9, 2020, Applications were approved to employ Ronald C. Sykstus, and David J. Philipps of Philipps and Philipps, Ltd. as special litigation counsel to pursue a Fair Debt Collection Practices Act (“FDCPA”) claim filed by the debtors.

2. The Parties to the claim have reached a settlement with Defendant in which all issues in the claim will be resolved. Special Litigation Counsel recommends to the Court that the settlement be approved.

3. The proceeds of the settlement will be distributed as follows:

- a. To the Debtors, the sum of \$1,000.00 pursuant to their claim of exemptions;

- b. To Ronald C. Sykstus for fees the sum of \$1034.00 pursuant to the fee shifting provisions of the FDCPA;
- c. To David J. Philipps for fees the sum of \$2414.00 pursuant to the fee shifting provisions of the FDCPA;
- d. To David J. Philipps for expenses in the amount of \$552.00, which is comprised of:
 - a. \$402 for the filing fee for the complaint
 - b. \$150 for pro hac admission to the U.S. District Court for the Northern District of Alabama for David J. Philipps and his law partner, Mary Philipps.

4. As a separate pleading, Special Litigation Counsel have filed Motions for Approval of Attorney's Fees, which requests their attorneys fees and expenses described above be approved and paid out of the amount received from the Defendants.

WHEREFORE, the Debtors, by and through their undersigned Counsel, request that this Court approve the settlement of the pending claim under the terms set forth above.

Respectfully submitted this 2nd day of February, 2021.

/s/Amy K. Tanner, Esq.
Debtors' Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the persons or entities set forth below:

Defendant:

Plaza Services LLC
c/o Jonathan H. Fain
66 Lenox Pointe, NE
Atlanta, GA 30324

Plaintiffs/Debtors

Todd and Tabitha Campbell
273 Ready Section Road
Hazel Green, Alabama 35750

Plaintiff's Attorney:

David J. Phillips
9760 S. Roberts Rd. Suite 1
Palos Hills, Illinois 60465

Richard Blythe, Esq.
Bankruptcy Administrator
U.S. Courthouse and Post Office
400 Wells Street
Decatur, AL 35602

Michele T. Hatcher
Chapter 13 Trustee
P.O. Box 2388
Decatur, AL 35602

and all persons and entities listed on the clerk's mailing matrix by depositing same in the United States mail, postage prepaid, this 2nd day of February 2021.

/s/Amy K. Tanner